



# Federal Communications Commission

Washington, D.C. 20554

January 11, 2006

Pursuant to Public Notice DA 05-3288, released December 22, 2005, the Wireline Competition Bureau hereby files the attached material related to SMS/800 Update 16.3 for inclusion in the record in CC Docket 01-92.

Material Provided by: InterMetro Communications, Inc.

Date: November 20, 2005.

For further information, contact Randy Clarke of the Pricing Policy Division, Wireline Competition Bureau at (202) 418-1530, or [randy.clarke@fcc.gov](mailto:randy.clarke@fcc.gov).

# Tariff Overview

- Tariff definition of Resp Orgs:

- “The entity that has total responsibility for the account management of a particular 800 number, including maintaining its customer record in the SMS/800 system. Also, the entity to which logon IDs are assigned. An entity which accesses the SMS/800 to (a) search for and reserve 800 numbers and (b) create and maintain 800 number customer records, including call processing records for exchange and exchange access 800 service.”

(SMS/800 Tariff §2.7, emphasis added)

- Tariff Provision Requiring Notice of SMS/800 Changes:

- “The Company will provide a minimum sixty (60) days advance notice to Resp Orgs of any changes in the screens used to input data on-line into the SMS/800 and for specification changes in the Mechanized Generic Interface. The Company will also notify Resp Orgs of any significant retraining as may be required by a major update, modification, and/or enhancement to any SMS/800 procedures which affect the Resp Org. The scheduling of any necessary formal retraining will be handled by the Company.”

(SMS/800 Tariff §2.1.6 (C), emphasis added)

- Tariff provision claimed by SMS/800 Management Team to provide authority for Release 16.3:

- “... In general, the Resp Org is responsible to: ... Notify and obtain the acceptance of any LEC or IC to which traffic for a specific 800 number will be routed. Notification and/or acceptance is not required for specific LECs and/or ICs who have waived their rights to be notified and/or to accept traffic.”

(SMS/800 Tariff §2.3.1, emphasis added)

**Deena Shetler**

**From:** Glenn A. Harris [glenn.harris@intermetro.net]  
**Sent:** Sunday, November 20, 2005 9:13 PM  
**To:** Deena Shetler; Judith Nitsche  
**Cc:** Ian Dillner; Steve Morris  
**Subject:** SMS/800 Tariff Citation re Exchange 800 Service

Dear Deena and Judy,

Thank you again for meeting with us on Thursday. We look forward to providing Staff a comprehensive legal brief in support of our position that SMS/800 Release 16.3 is contrary to law and regulation. However, we wanted to provide a tariff citation in advance of your meeting with Verizon/SMT tomorrow (Monday) that clarifies not all 8YY traffic is "access." We also wanted to provide a real-life example of why blocking 0110 CIC traffic is extreme and unnecessary.

**Some 8YY Services Are Not "Access" Services**

The SMS/800 Tariff definition of Resp Org is the following:

"The entity that has total responsibility for the account management of a particular 800 number, including maintaining its customer record in the SMS/800 system. Also, the entity to which logon IDs are assigned. An entity which accesses the SMS/800 to (a) search for and reserve 800 numbers and (b) create and maintain 800 number customer records, including call processing records for **exchange and exchange access 800 service.**" (SMS/800 Tariff §2.7, emphasis added.)

According to the tariff, not all 800 services are exchange access 800 services – some 800 services are exchange 800 services (i.e., those that use the 0110 CIC). This provision also illustrates how Release 16.3 would simply take away material rights purchased by Resp Orgs and give those rights to LECs. Attached for your convenience are the tariff excerpt side from InterMetro's presentation and the SMS/800 Tariff.

**Blocking Traffic Is Extreme And Unnecessary**

InterMetro recently removed 0110 CIC traffic from a CLEC partner's network after receiving a request from the CLEC to do so. Although it was unfortunate that this CLEC weakened under, what we consider unlawful threats of some ILECs, InterMetro and this CLEC cooperated in the network transition. No consumers' services were disrupted because InterMetro was able to find an alternate service provider. While we are concerned that these aggressive ILECs will continue to bully our remaining CLEC partners, a cooperative transition, rather than simply blocking traffic, is the best way to ensure consumers' interests are protected.

Lastly, as the inter-carrier compensation disputes increase, so does the potential for disruptive unilateral conduct. For the SMT to provide carriers the most powerful tool of all – the ability to block the traffic of their competitors – we believe, would be a disaster for the industry and consumers.

Thank you again for your attention to this matter.

Best regards,  
Glenn

1/4/2006

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## **800 Service Management System (SMS/800) Functions**

Regulations, Rates and Charges  
Applying to the Provision of  
SMS/800 Functions and  
Support Services

x Issued under authority of Special Permission No. 93-213.  
All material contained herein is new.

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**Issued: March 5, 1993**

**Effective: May 1, 1993**

**The names, titles and address of the  
tariff's Issuing Officers are located  
on Title Pages 2 through 4**

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**The names, titles and address of the  
tariff's Issuing Officers are located  
on Title Pages 2 through 4**

**SMS/800 FUNCTIONS**

**ISSUING CARRIERS**

*Quintin Lew*

Vice President, Access Product/Platform  
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T

For Verizon Delaware Inc.  
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Verizon New England Inc.  
Verizon New Jersey Inc.  
Verizon New York Inc.  
Verizon Pennsylvania Inc.  
Verizon Virginia Inc.  
Verizon Washington DC Inc.  
Verizon West Virginia Inc.

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For the States of:

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Georgia  
Kentucky  
Louisiana  
Mississippi  
North Carolina  
South Carolina  
Tennessee

This page filed under Transmittal No. 28

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tariff's Issuing Officers are located  
on Title Pages 2 through 4

THE BELL OPERATING COMPANIES

TARIFF F.C.C. NO. 1  
6th Revised Title Page 3  
Cancels 5th Revised Title Page 3

**SMS/800 FUNCTIONS**

**ISSUING CARRIERS**

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**SMS/800 FUNCTIONS**

**ISSUING CARRIERS**

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New Mexico  
North Dakota  
Oregon  
South Dakota  
Utah  
Washington  
Wyoming

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This page filed under Transmittal No. 28

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Issued: May 31, 2005

Effective: June 15, 2005

The names, titles and address of the  
tariff's Issuing Officers are located  
on Title Pages 2 through 4

## SMS/800 FUNCTIONS

Under authority of DA 01-1428, adopted and released on June 14, 2001, material filed under Transmittal No. 18 to become effective June 15, 2001 is suspended for one day to become effective June 16, 2001. The following pages were suspended for a day:

Transmittal No. 18

<u>Page</u>	<u>Revision</u>
Title Page 2	6th Revised
Title Page 3	6th Revised
Title Page 4	7th Revised
7	1st Revised
10	3rd Revised
11	3rd Revised
13	3rd Revised
19	1st Revised
26	1st Revised
27	2nd Revised
28	3rd Revised
31	1st Revised
34	2nd Revised
35	2nd Revised
39	1st Revised
48	1st Revised
50	2nd Revised
51	1st Revised
52	1st Revised
55	2nd Revised
55.1	3rd Revised
57	2nd Revised
59	4th Revised
60	5th Revised
61	5th Revised

This page filed under Transmittal No. 19

Issued: June 20, 2001

The names, titles and address of the  
tariff's Issuing Officers are located  
on Title Pages 2 through 4

SUPPLEMENT No. 3

*This supplement defers the effective date of revisions filed under Transmittal No. 16  
From May 19, 2000 to June 2, 2000.*

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This page filed under Transmittal Number 17

Issued: May 16, 2000

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tariff's Issuing Officers are located  
on Title Pages 2 through 4

SMS/800 FUNCTIONS

*Under authority of DA 94-624, of the Federal Communications Commission, the effective date of tariff material contained in the following transmittal, modifying certain rate levels to reflect more current cost and demand data, originally scheduled to become effective June 15, 1994, is suspended for one day until June 16, 1994.*

Transmittal No.7  
2<sup>nd</sup> Revised Page 60

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Issued: June 14, 1994

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tariff's Issuing Officers are located  
on Title Pages 2 through 4

**ACCESS SERVICE**

Under authority of Special Permission No. 93-349 of the Federal Communications Commission, the effective date of tariff material contained in the following transmittal, submitting the tariff and support documentation to provide 800 Service Management System (SMS/800), originally scheduled to become effective May 1, 1993, is advanced for one day to April 30, 1993 and then suspended for one day to May 1, 1993.

Transmittal No. 1

Original Pages 1 through 61

Also under authority of Special Permission No. 93-349 of the Federal Communications Commission, the effective date of tariff material contained in the following transmittal, modifying material including minor rate changes to reflect corrections to demand and cost data submitted in Transmittal No. 1, originally scheduled to become effective May 1, 1993, is advanced for one day to April 30, 1993 and then suspended for one day to May 1, 1993.

Transmittal No. 2

1<sup>st</sup> Revised Page 60

1<sup>st</sup> Revised Page 61

Also under authority of Special Permission No. 93-349 of the Federal Communications Commission, the effective date of tariff material contained in the following transmittal, proposing to modify material to include provisions and rates for Resp Org changes performed by the Number Administration and Service Center (NASC), originally scheduled to become effective May 1, 1993, is advanced for one day to April 30, 1993 and then suspended for one day to May 1, 1993.

Transmittal No. 3

1<sup>st</sup> Revised Page 3

1<sup>st</sup> Revised Page 5

1<sup>st</sup> Revised Page 10

1<sup>st</sup> Revised Page 11

1<sup>st</sup> Revised Page 27

1<sup>st</sup> Revised Page 28

Original Page 28.1

1<sup>st</sup> Revised Page 45

1<sup>st</sup> Revised Page 46

Original Page 55.1

1<sup>st</sup> Revised Page 59

2<sup>nd</sup> Revised Page 61

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**Issued: April 29, 1993**

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tariff's Issuing Officers are located  
on Title Pages 2 through 4**

## SMS/800 FUNCTIONS

## CHECK SHEET

Title pages and Page 1 through 61 inclusive of this tariff are effective as of the date shown. Original and revised Pages as named below and Supplement Nos. 1, 2 and 3 contain all changes from the original tariff that are in effect on the date hereof.

<u>Page</u>	<u>Number of Revision Except as Indicated</u>	<u>Page</u>	<u>Number of Revision Except as Indicated</u>	<u>Page</u>	<u>Number of Revision Except as Indicated</u>
Title Page 1	Original	28	3rd	55.1	3rd
Title Page 2	8th*	28.1	1st	56	Original
Title Page 3	6th	29	1st	57	2nd
Title Page 4	9th*	30	1st	58	Original
1	28th*	31	1st	59	4th
2	4th	32	5th	59.1	1st
3	2nd	33	Original	60	12th*
4	1st	34	2nd	61	12th*
5	3rd	35	2nd		
6	1st	36	3rd		
7	1st	37	Original		
8	1st	38	Original		
9	1st	39	1st		
10	4th	40	1st		
11	4th	41	Original		
12	1st	42	Original		
13	4th	43	Original		
13.1	1st	44	Original		
14	2nd	45	1st		
15	2nd	46	1st		
16	Original	46.1	1st		
17	1st	46.2	1st		
18	1st	46.3	1st		
19	3rd	46.4	1st		
20	3rd	46.5	1st		
21	Original	47	Original		
22	1st	48	2nd		
23	1st	49	Original		
23.1	Original	50	3rd		
23.2	2nd	51	2nd		
24	1st	52	2nd		
25	2nd	53	2nd		
26	1st	54	2nd		
27	2nd	55	3rd		

\* denotes Check Sheet change

This page filed under Transmittal No. 28

Issued: May 31, 2005

Effective: June 15, 2005

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on Title Pages 2 through 4

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**SMS/800 FUNCTIONS**

**CONCURRING CARRIERS**

NO CONCURRING CARRIERS

**CONNECTING CARRIERS**

NO CONNECTING CARRIERS

**OTHER PARTICIPATING CARRIERS**

NO OTHER PARTICIPATING CARRIERS

**REGISTERED SERVICE MARKS      REGISTERED TRADE MARKS**

NONE

SMS/800

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Issued: May 31, 2001

Effective: June 15, 2001

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**SMS/800 FUNCTIONS****EXPLANATION OF SYMBOLS**

- C - To signify a changed regulation
- D - To signify a discontinued rate or regulation
- I - To signify an increase
- M - To signify matter relocated without change
- N - To signify new rate or regulation
- R - To signify a reduction
- S - To signify a reissued matter
- T - To signify a change in text but no change in rate or regulation
- Z - To signify a correction

**EXPLANATION OF ABBREVIATIONS**

- |         |   |  |   |
|---------|---|--|---|
| AOS     | - | Area of Service  |   |
| CAD     | - | Customer Administrative Data                               | D |
| CCITT   | - | International Telephone & Telegraph Consultative Committee |   |
| CCS/SS7 | - | Common Channel Signaling/Signaling System 7                |   |
| CMSDB   | - | Call Management Services Data Base                         |   |
| CPR     | - | Call Processing Record                                     |   |
| CR      | - | Customer Record  |   |
| DCE     | - | Data Circuit Terminating Equipment                         | D |
| DSU     | - | Data Service Unit  |   |
| DTE     | - | Data Terminal Equipment                                    |   |
| HDLC    | - | High Speed Data Link Control                               |   |
| IC      | - | Interexchange Carrier                                      |   |
| ID      | - | Identification   |   |
| IMS     | - | Information Management System                              |   |

## SMS/800 FUNCTIONS

## EXPLANATION OF ABBREVIATIONS (Cont'd)

LAD	-	Label Definition
LEC	-	Local Exchange Company
LSMS	-	Local Service Management System
MGI	-	Mechanized Generic Interface
NANP	-	North American Numbering Plan
NCC	-	Network Control Center
NPA	-	Numbering Plan Area
OS	-	Operations System
POTS	-	Plain Old Telephone Service
RAO	-	Revenue Accounting Office
RCC	-	Radio Common Carrier
Resp Org	-	Responsible Organization
SCP	-	Service Control Point
SMS	-	Service Management System
SMS/800	-	800 Service Management System
SSP	-	Service Switching Point
STP	-	Signal Transfer Point
UAL	-	User Application Layer
UPL	-	User Program Layer

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**SMS/800 FUNCTIONS****REFERENCE TO TECHNICAL PUBLICATIONS**

The following technical publications are referenced in this tariff and may be obtained from the  
SMS-800 website ([www.sms800.com](http://www.sms800.com)).

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BR 780-004-220	800 Service Management System User Guide: General Procedures		
Issue 19:	November 2001	Available: November 2001	T
BR 780-004-221	800 Service Management System User Guide: 800 Service Management		
Issue 28:	November 2001	Available: November 2001	T
BR 780-004-224	800 Service Management System User Guide: SMS Administration		
Issue 30:	June 2003	Available: June 2003	T

This page filed under Transmittal Number 25

Issued: August 22, 2003

Effective: September 06, 2003

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tariff's Issuing Officers are located  
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**SMS/800 FUNCTIONS****REFERENCE TO TECHNICAL PUBLICATIONS (Cont'd)**

The following technical publications are referenced in this tariff and may be obtained from the  
SMS/800 website ([www.sms800.com](http://www.sms800.com)). C  
C

SR-4592	Service Management System (SMS)/800 Mechanized Generic Interface Specification		
Issue 9:	July 2003	Available: July 2003	T
SR-STS-002352	SMS/800 – OS Mechanized Generic Interface Industry Test Specifications		N N
Issue 15, Revision 1:	May 2003	Available: May 2003	N

**This page filed under Transmittal Number 25**

**Issued: August 22, 2003**

**Effective: September 06, 2003**

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on Title Pages 2 through 4**